

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

FILED/ACCEPTED

JUN 30 2011

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
Amendment of Section 73.202(b))	MB Docket No. _____
Table of Allotments)	
FM Broadcast Stations)	RM No. _____
(Altamont, Oregon))	

TO: The Secretary
ATTN: Chief, Policy Division,
Media Bureau

PETITION FOR RULE MAKING

Threshold Communications ("TC"), by counsel and pursuant to §1.401 and §1.420 of the Commission's rules, hereby petitions the Commission to commence a rule making proceeding for the purpose of amending §73.202(b) of the Commission's rules, the FM Table of Allotments, so as to delete the existing vacant allotment of Channel 249C1 at Altamont, Oregon and substitute in its place the equivalent Channel 235C1 at Altamont.

TC is the winning bidder in Auction No. 91 for a new construction permit on Channel 290A at Butte Falls, Oregon. In an application being filed simultaneously herewith, TC is proposing a minor modification to the Butte Falls allotment so as to move from Channel 290A to Channel 249A. Channel 249A at Butte Falls is mutually exclusive with Channel 249C1 at Altamont. Consequently, TC seeks the substitution of the Altamont allotment so as to accommodate its application at Butte Falls. TC does not plan to submit a construction permit application for the Altamont channel.

Submitted herewith is a Technical Statement to demonstrate that the proposal would comply with the Commission's technical rules.

Upon consideration of the forgoing and the demonstration in the accompanying Technical Statement, TC respectfully urges the Commission to amend the FM Table of Allotments as follows:

Altamont, Oregon

Present

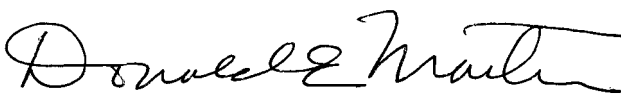
249C1

Proposed

235C1

Respectfully submitted

THRESHOLD COMMUNICATIONS

By: 
Donald E. Martin

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Its Attorney

June 30, 2011

PETITION FOR RULE MAKING
THRESHOLD COMMUNICATIONS
SUBSTITUTE CH 235C1 FOR CH 249C1
ALTAMONT, OREGON
June 2011

TECHNICAL STATEMENT

1. These comments and attached exhibits were prepared on behalf of Threshold Communications ("TC"), the winner in Auction 91 of the new FM allotment on Channel 290A at Butte Falls, Oregon. In an FCC Form 301 application for construction permit for its Butte Falls, Oregon facility, TC is proposing a non-adjacent channel change from Channel 290A to Channel 249A. The use of Channel 249A at Butte Falls, Oregon is mutually exclusive with the vacant allotment of Channel 249C1 at Altamont, Oregon.¹ TC herein submits a Petition for Rule Making which seeks to substitute Channel 235C1 for the vacant Channel 249C1 at Altamont, Oregon.

PROPOSAL

2. TC requests that Channel 235C1 be substituted for Channel 249C1 at Altamont, Oregon. As indicated on Exhibit #1, Channel 235C1 meets the Commission's minimum distance separation requirements from the proposed allocation site at North Latitude 42° 07' 04.0" and

1) Channel 249C1 was an unbuilt facility in Altamont, Oregon. Channel 249A had been in use in the community through an interim facility, and was previously associated with KRAT, Altamont, Oregon. In a Commission letter dated November 18, 2009, DA 09-2436, the FCC deleted the call sign of the station and ordered the station to cease broadcasting. It further found that the station's license had expired February 1, 2006. The CDBS database shows that, in addition to a vacant allotment of Channel 249C1 at Altamont, a pending modification application for Channel 249C1 was submitted by the former licensee of KRAT, but the application (BMPH-19990429ID) was dismissed on January 4, 2010. In discussions with James Bradshaw and Arthur Doak of the Commission's staff, they indicated that Channel 249C1 at Altamont, Oregon is a vacant channel.

West Longitude 121° 21' 50.0. This represents a site restriction of 31.1 kilometers east-southeast of the community.²

3. From the proposed allocation site at Altamont, Oregon, Channel 235C1 will provide a 70 dBu contour over 100% of the community of Altamont, Oregon, in compliance with §73.315(a) of the rules (Exhibit #2). Further, the proposed allocation site is not located off-shore or on airport property and is, therefore, suitable for tower construction. A portion of a 7.5 minute topographic map showing the proposed allocation site is attached as Exhibit #3.

4. Therefore, TC requests the following changes to the Commission's Table of Assignments and Allocations:

Altamont, Oregon

Present 249C1	Proposed 235C1
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5. The proposed changes requested herein will provide for a viable channel on which service to Altamont, Oregon can be implemented.

6. The foregoing was prepared on behalf of Threshold Communications by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge.³

2) The proposed allocation reference site was selected to provide line-of-sight into the community of Altamont, Oregon. The elevation of the reference site is 5,680 feet above mean sea level. Therefore, the site provides for a height above average terrain in excess of 299.0 meters.

3) All data regarding FM facilities was extracted from the Commission's CDBS database on the date indicated on the respective spacing studies. We assume no liability for errors or omissions in the database which may be adverse to the request contained herein. Submission of these comments by the petitioner/applicant is acceptance of these terms.

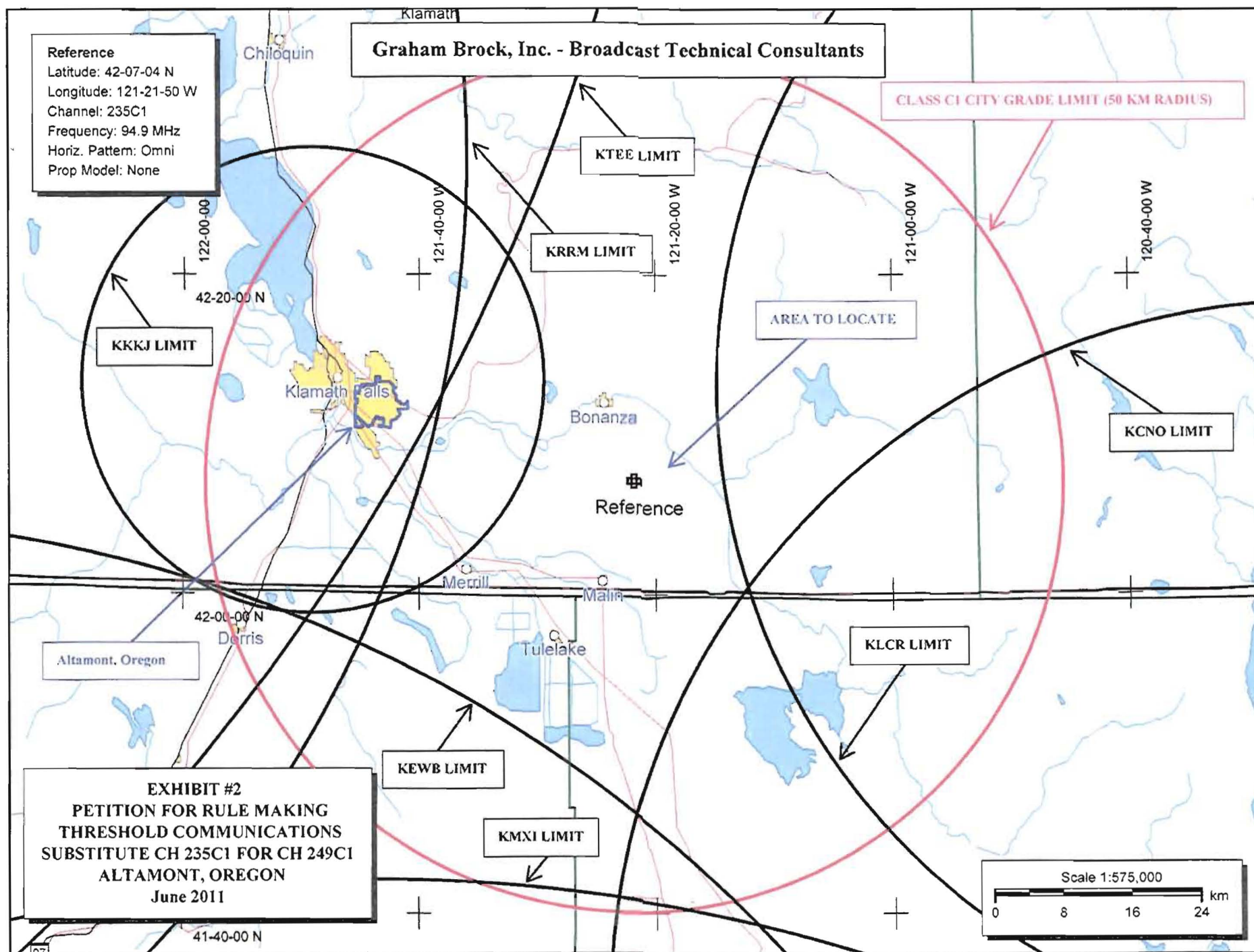
PETITION FOR RULE MAKING
THRESHOLD COMMUNICATIONS
SUBSTITUTE CH 235C1 FOR CH 249C1
ALTAMONT, OREGON
June 2011

EXHIBIT #1

Allocation Study for Altamont, Oregon
Using Proposed Allocation Site as Reference

REFERENCE		CLASS = C1	DISPLAY DATES
42 07 04.0 N.		Current Spacings to 3rd Adj.	DATA 06-29-11
121 21 50.0 W.			SEARCH 06-29-11
----- Channel 235 - 94.9 MHz -----			

Call Lat.	Channel Lng.	Location Ant	Power	Azi HAAT	Dist	FCC	Margin
AD235	ADD 235C1	Altamont	OR	0.0	0.0	245.0	-245.0
	42 07 04.0	121 21 50.0	CX	0.000 kW		0 M	
	Substitute Channel						
KLCR	LIC 237C3	Lakeview	OR	82.7	86.4	76.0	10.4
	42 12 40.0	120 19 35.0	CX	0.780 kW		420 M	
	Woodrow Michael Warren BLH-20030423ABH						
KKKJ	LIC 288C2	Merrill	OR	287.6	39.3	27.0	12.3
	42 13 24.0	121 49 02.0	CX	18.000 kW		209 M	
	Cove Road Publishing, LLC BLH-20080130API						
KCNO	LIC 233C1	Alturas	CA	127.8	100.0	82.0	18.0
	41 33 50.0	120 24 55.0	HN	100.000 kW		-59 M	
	Edi Media, Inc. BLH-19890920KE						
KRRM	LIC-N 234A	Rogue River	OR	284.1	157.0	133.0	24.0
	42 26 44.0	123 12 56.0	NCN	0.130 kW		623 M	
	Shirley M. Bell BLH-19941027KC						
KTEE	LIC-N 235C1	North Bend	OR	297.7	269.5	245.0	24.5
	43 12 18.0	124 18 07.0	NC	89.000 kW		191 M	
	Bicoastal Media Licenses Inc. BLH-20010525ABX						
KEWB	LIC 234C2	Anderson	CA	211.1	189.6	158.0	31.6
	40 39 06.0	122 31 32.0	CN	4.200 kW		477 M	
	Results Radio of Redding BLH-19910918KA						
KMXI	LIC 236B	Chico	CA	187.2	243.0	195.0	48.0
	39 56 46.0	121 43 17.0	CN	8.700 kW		357 M	
	Deer Creek Broadcasting BLH-19840306DD						



BROADCAST TECHNICAL CONSULTANTS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

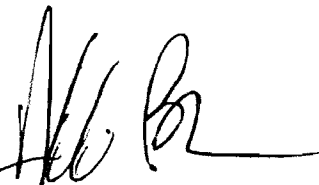
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Threshold Communications to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

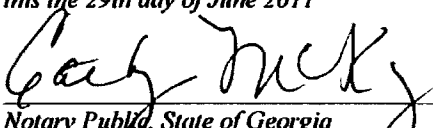
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 29th day of June 2011.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 29th day of June 2011*



Notary Public, State of Georgia
My Commission Expires: March 14, 2015